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August 10, 2021

VIA ECF ONLY

Hon. Judge Michael Vasquez
United States District Judge
United States P.O. & Courthouse
Federal Square
Newark, New Jersey 07101

Re: *USA v. Andrews, et al.*
Criminal No. 20-578-JMV

Dear Judge Vasquez:

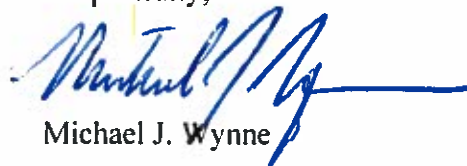
This firm represents Defendant Chad Beene in the above-referenced matter. We are submitting the following request on behalf of Mr. Beene, Defendant Jeff Andrews, and Defendant Robert Schneiderman, with the permission of counsel. Pretrial motions currently are due to be filed on or before August 13, 2021. Counsel requests a sixty (60) day extension of time within which to file pretrial motions, with the consent of all defense counsel. Since first communicating with the Court regarding this request, AUSA Gould has confirmed that he does not object to it.

The reasons for this request are as follows:

- 1.) Counsel continues to review the substantial quantity of documents produced by the government in discovery but that review has not been completed, as previously expected.
- 2.) The government will not be prejudiced by the requested extension because the Court has given trial priority to matters involving incarcerated defendants and, consequently, it seems unlikely that this complex matter involving multiple defendants who have been granted pretrial release will be scheduled for trial in the near future.

Thank you for the Court's consideration of this request.

Respectfully,

A handwritten signature in blue ink, appearing to read "Michael J. Wynne", with a long horizontal flourish extending to the right.

Michael J. Wynne

cc: All Counsel of Record (via ECF)